

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**SANDY HOOK FAMILIES’  
WITNESS AND EXHIBIT LIST**

Judge	Hon. Christopher M. Lopez
Hearing Date	Wednesday, October 26, 2022
Hearing Time	1:00 p.m. (CST)
Party’s Name	Sandy Hook Families
Attorney’s Names	Ryan Chapple (Connecticut Plaintiffs) Avi Moshenberg, Jarrod Martin (Texas Plaintiffs)
Attorney’s Phone	512-477-5000 (Ryan Chapple) 713-337-5580 (Avi Moshenberg) 713-356-1280 (Jarrod Martin)
Nature of Proceeding	Cash Collateral Motion [Dkt. 6]

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, the “Texas Plaintiffs”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Connecticut Plaintiffs” and together, the “Sandy Hook Families”) hereby submit this Witness and Exhibit List in connection with the hearing on (i) *Debtor’s Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(B) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender* (the “Cash Collateral Motion”)

[Dkt. 6]; to be held on Wednesday, October 26, 2022 at 1:00 p.m. (Central Standard Time):

The Sandy Hook Families reserve the right to supplement, amend, or revise this Witness and Exhibit List at any time prior to the hearing. The Sandy Hook Families reserve the right to supplement the Witness and Exhibit List with new witnesses and additional exhibits. Further, the Sandy Hook Families reserve the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Sandy Hook Families further reserve the right to introduce exhibits previously admitted.

#### **WITNESS LIST**

The Sandy Hook Families may call the following witnesses at the hearing:

1. Patrick Magill, Chief Restructuring Officer of Debtor;
2. W. Marc Schwartz, former proposed Chief Restructuring Officer of Debtor;
3. Robert Roe, PQPR Holdings Limited, LLC corporate representative;
4. David Jones, managing member of JLJR Holdings, LLC, which is the managing member of PQPR Holdings Limited, LLC;
5. Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
6. Any witness listed or called by any other party.

#### **EXHIBIT LIST**

The Sandy Hook Families may offer for admission into evidence any of the following exhibits at the hearing:

<b>No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
1.	Debtor's Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the				

	Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender [Dkt. 6]				
2.	Declaration of W. Marc Schwartz in Support of Voluntary Petition and First Day Motions [Dkt. 10]				
3.	Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 41]				
4.	Order Modifying Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 64]				
5.	Second Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 98]				
6.	Third Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 151]				
7.	Fourth Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 238]				
	Any document or pleading filed in the above-captioned case				
	Any exhibits identified or offered by any other party				
	Any exhibits necessary for impeachment and/or rebuttal purposes				

Respectfully submitted this 24th day of October 2022.

**MCDOWELL HETHERINGTON LLP**

Avi Moshenberg  
Texas Bar No. 24083532  
1001 Fannin Street, Suite 2700  
Houston, Texas 77002  
D: 713-337-5580  
F: 713-337-8850  
E: [Avi.Moshenberg@mhllp.com](mailto:Avi.Moshenberg@mhllp.com)

***Counsel for the Texas Plaintiffs***

and

**CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, PC**

By: /s/Jarrold B. Martin  
Jarrod B. Martin  
Texas Bar No. 24070221  
1200 Smith Street, Suite 1400  
Houston, Texas 77002  
D: 713.356.1280  
F: 713.658.2553  
E: [jarrod.martin@chamberlainlaw.com](mailto:jarrod.martin@chamberlainlaw.com)

***Bankruptcy Counsel for the Texas Plaintiffs***

By: /s/ Ryan Chapple  
Ryan E. Chapple  
State Bar No. 24036354  
Email: [rchapple@cstrial.com](mailto:rchapple@cstrial.com)  
**CAIN & SKARNULIS PLLC**  
303 Colorado Street, Suite 2850  
Austin, Texas 78701  
512-477-5000  
512-477-5011—Facsimile

***Bankruptcy Counsel for Connecticut Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 24th day of October 2022.

/s/ Ryan E. Chapple

Ryan E. Chapple